

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

Tyrone Henderson
on behalf of himself and others similarly
situated,

Plaintiff,

v.

Verifications Incorporated,

Defendant.

Civil Action No. 3:11cv514-REP

**MOTION FOR AGREED ORDER GRANTING PRELIMINARY APPROVAL OF
SETTLEMENT, CERTIFYING CLASS FOR PURPOSES OF SETTLEMENT,
APPOINTING CLASS COUNSEL, DIRECTING NOTICE TO THE CLASS AND
SCHEDULING FAIRNESS HEARING**

Pursuant to Fed. R. Civ. P. 23(e) and Rule 7 of the Local Rules for the United States District Court for the Eastern District of Virginia, Plaintiff, Tyrone Henderson, by counsel, on behalf of himself and all members of the proposed Settlement Class, with the consent and agreement of Defendant, Verifications, Inc., by counsel, respectfully move this Court for the entry of an Order:

- (1) preliminarily approving a proposed class settlement,
- (2) scheduling a fairness hearing,
- (3) certifying a class for purposes of the proposed class settlement,
- (4) appointing class counsel, and
- (5) approving the form and manner of notice proposed to be sent to all members of the settlement class.

The terms of the settlement fully agreed between the parties are as stated in the Settlement Agreement attached hereto as Exhibit 1. The proposed Preliminary Approval Order is as attached hereto as Exhibit 2. The parties are circulating these documents for signatures and will also file proposed Class Notices by Monday, October 29, 2012.

In support of this motion, the Parties rely on the arguments and authority set forth in the Memorandum of Points and Authorities filed contemporaneously with this Motion.

Respectfully Submitted,

/s/

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Counsel for Plaintiff

CERTIFICATE OF SERVICE

On this 23d day of October 2012, I certify that I have electronically filed the foregoing pleading in the CM/ECF system, which shall send a Notice of Electronic Filing (NEF) to the following:

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